

I have been a licensed Amateur Radio Operator for 48 years, getting my Novice in January 1955 and earning my Amateur Extra in 1977. I became a VE in 1984. Further, I worked in electronics for 20 years and am now a Professor Emeritus, having retired from a major community college district after twenty years. I am neither an engineer nor attorney, as many of the writers of petitions and comments seem to be. Still, this background gives me good insight into the level of knowledge needed to function on technical and communications planes.

I speak only for myself, not for any amateur related organizations that I belong to; nor do they speak for me.

Having intently read RM-10781 through –10787, my first opinion of RM-10787 is that it heavily parallels the content of RM-10786, submitted by No Code International (NCI). This is not really a surprise, since Mr. Maia was once the Executive Director of NCI and both these organizations have been headquartered at the W5YI Group.

Specifically, I have found the following:

PETITION FOR RULE MAKING

Page	Para	Comment
1	Generally	I ask to whom this “umbrella organization” is directly responsible to, especially in the case of an amateur who does not belong to any amateur-related organization. Also, exactly what was the vote tally, listing those for and against.
2	3	This follows the NCI petition.

I. Introduction and Background

2	1	Morse station identifications are currently in use by the FAA in identifying navigation beacons at 7 WPM, which is 40% faster than the amateur requirement. The terrorists of September 11 were known to have taken flying lessons and therefore were cognizant of Morse. It then follows that high-speed Morse has positive implications for Homeland Security, in that it is easily done with more simple equipment and thus provides a measure of security in the transmission.
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II. Telegraphy requirement...

3 3 Opens the door to the “barrier” argument.

III. Morse code testing is a burden to the applicant

- 3 1 How good are these efficient computers when there is no power, either on the mains or in the battery? Generally, it takes less DC power to get CW through. (Read longer battery life.)
- 2 Any testing mechanism can be a “burden” on the unprepared (believe me, I’ve been there). I must ask the readers if they were absolutely comfortable in taking their first driver’s test (I apologize to those physically unable to drive, as my wife is, but I needed to make the point). Burdens are usually self-imposed. So, exactly what is the relevance here? The code issue is left to each administration.
- 3 In WT-98-143, the FCC stated that amateur radio “is fundamentally a technical service”. Yes, it is and always has been a “technical service” and therefore has standards imposed upon it. Those wishing to join it should be well aware of the obligations and privileges. For beginners, Ohm’s and Watt’s Laws, the very foundation of electronics, must be memorized, just as the NCVEC suggests is the only way with code. Should these be jerked from the Question Pools under the same rationale, especially since there are some licensees who have forgotten everything before the VE’s signatures are dry? And how do they justify “perhaps most” in the last sentence?
- 4 The lack of interest is the individual’s choice, just like in real life. Doctors must study anatomy and do supervised operations in residency, even though they really want to be a psychiatrist.

IV. Morse proficiency is not...

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| 4 | Generally | Of course it isn't. There are bad examples in any field. |
| 2 | | Does it follow that a person "with vast knowledge", let's assume a Ph. D. in a field of communications, should automatically be given an Amateur Extra? Here again, personal dislike is the key and cannot be legislated. |
| 3 | | Wider use is an excellent idea; but there are still laws under which we must work. |

V. Morse proficiency should not...

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| 4 | Generally | I would refer the reader to "Is Morse Code Dead?" by Walter Fair, W5ALT, in which his data indicate that, on HF, Morse runs a very close (if not leading on some bands) second to SSB. So, why is there a heavy push for HF privileges without code? |
| 2 | | In other RM's and comments, it has been stated that there are over 1000 (unspecified) modes of operation. SSB, FM, packet and other modes are covered somewhat in the written elements. |
| 3 | | Will the day come when you must be tested and certified for each mode you want to work? Shall we then look like my mechanic friend Dave (AdvancedClass) and wear a sleeveful of stripes showing our expertise? |

VI. An unnecessary burden...

- 4 Generally This is the beginning of the burden area--
Don't most VE teams buy commercial products, or is our local team too archaic, since we use the store-bought stuff? I know the disruption area— in 1976, I decided to go down to the FCC office and get my Advanced. Since we Generals obviously had the 13 WPM, we were given the writtens and told to start on them. Suddenly, the code started over the loudspeaker, so I stopped my test and started to copy it, something I hadn't done in a very long time. This gave me the impetus to get my Amateur Extra the next year.
- 2 This really gets back to personal preparedness for the task. I agree that meeting the letter of the law at 5 WPM is very difficult. See how much easier it was at 13 and 20 WPM?
- Parenthetically, does the reader know that the FCC is still Issuing new Radiotelegraph licenses? Code speeds are 16 and 20 code groups (5 letters each) and 20 and 25 WPM text. Need more info? Contact the FCC or The W5YI Group costs and testing locations.

VII. An unnecessary burden...

- 5 Generally Sometimes, we just can't meet our goal for whatever reason. I wanted to be an engineer when I was younger. I spent many hours in classrooms, but I didn't pass the exams. And, yes, in getting to my Master's, I took classes that I can't remember. So, this "loss" is not unique to hamdom, and should not be presented as such.
- 1,2 Please see my W5ALT note at paragraph V. Thanks.

VIII. An unnecessary burden...

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| 5 | 1 | Throughout testing, many handicapped applicants have successfully passed all levels of code testing, using various methods. I'll be the FCC had a few around the office. Contact HandiHams for details. |
| | 2 | We (the USA) still have the 5 WPM code test and there has always been the need to pass this level. Until the part 97 is changed, it will remain a valid part of the test. Based on valid medical reasons, the 13 and 20 WPM could be waived in the past; now there is no need to waive. |
| | 3 | If the VE team and the applicant dispute this "waiver", perhaps the applicant should make arrangements to take the test directly in front of an FCC official. That is permissible today.
Sentence 3 seems incomplete... perhaps they meant History has shown...so lets not have controversy." |

IX. WARC 2003

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| 5 | 1 | Somehow, I recall losing frequencies—seems a guy named DeSoto wrote a book called "200 Meters and Down". He was mentioned in the NCI petition. |
| 6 | 6 | We still get back to "Administrations shall determine..."; so it is solely up to the FCC, which is why we have this debate. Ad-min-is-tra-tions is 5 syllables; maybe it's too long for some to comprehend? |

Additional personal comments:

I have tried too many times to find the NCVEC website, so my data may be off here and there.

There is absolutely no mention of how eliminating Element 1 will impact the others.

Given the scenario that Element 1 is eliminated for whatever reason, then Elements 2, 3 and 4 would have to be modified to include appropriate questions on Morse operation because of its high usage, just as SSB, FM, packet and other modes are now tested.

Consider then, the number of questions currently in each element are 35, 35 and 50, respectively. What current valid questions would have to be removed?

In this regard, I again refer the reader to the yet unnumbered petition by AE4FA and K0PU, where they critically analyze the contents of the National Council of Volunteer Examiner Coordinators (NCVEC) pools over the years. Part 97.1 (d) mentions "...trained operators, technicians, and electronics experts." I often wonder how answering 75% of 120 known questions does an expert make??

Both the unnumbered petition and the Morse item are available several places on the Internet. If you don't have access, please ask a friend to do a search (www.QRZ.com is a good starter) and provide you with a copy.

Therefore, I would not support this RM.

Thank you for reading and considering my view on this Rulemaking.

Richard T. Martin, N6ZQ
11218 NE 12th Avenue
Vancouver WA 98685-4008
n6zq@arrl.net